

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP

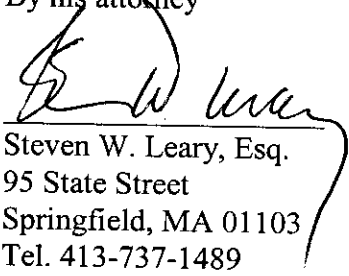
ALBERT INNARELLI, ET AL,
DEFENDANTS

MOTION OF DEFENDANT MICHAEL BERGDOLL
TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant Michael Bergdoll and moves that the conditions of his pre-trial release restricting his travel to the Commonwealth of Massachusetts be modified so as to allow the request contained herein. The defendant seeks permission to travel to North Franklin, Connecticut on Friday, January 21, 2005 and Saturday, January 22, 2005 between the hours of 7:00am and 7:00pm to an auction of used construction equipment at firm known as Petrowsky's which deals in used construction equipment and is located on Route 32 in North Franklin, CT. Counsel for the defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the defendant respectfully that the within motion be allowed.

The Defendant
Michael Bergdoll
By his attorney

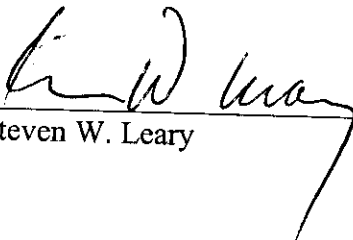


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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

January 21, 2005



Steven W. Leary